

**Federal Defenders
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Southern District of New York
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December 20, 2023

VIA EMAIL AND ECF

The Honorable Kenneth M. Karas
United States District Court Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: *United States v. Jakeem Sylvester*, 22-cr-17-1 (KMK)

Dear Honorable Judge Karas:

I write to respectfully request Your Honor issue an order releasing Mr. Sylvester from BOP custody tomorrow December 21, 2023, at 10:00 a.m.

Following the bail hearing on Monday, December 18, 2023, I have been in communication with the government through Assistant United States Attorney Jennifer Ong. We have been working to arrange for Mr. Sylvester's transport to the courthouse to sign the appearance bond as noted in Your Honor's order dated December 19, 2023. Ms. Ong has issued a writ to produce him, but it is unclear when Mr. Sylvester will arrive.

We have communicated with the USMS. After the writ was submitted to JAPAT, which is a system that arranges for the scheduling of transport of federal inmates, to schedule the transport back to the SDNY. We have been informed that because he is a sentenced prisoner, he has to go to MDC Brooklyn first. The schedule for his transport has not yet been released. I have been in communication with Mr. Sylvester, and he has informed me that transport from Schuylkill, where he is currently housed, leave on Mondays. As the next two Mondays are holidays, I am concerned that he may remain in custody an addition three weeks at the very least.

I have communicated with Mr. Sylvester's father, James Elliot, a retired truck driver, and he is available to go to FCI Schuylkill in Minersville, PA and pick up Mr. Sylvester once he is released and drive him to the White Plains Courthouse to sign the bond and meet with Pre-Trial Services. The trip from Poughkeepsie, NY to Minersville, PA is roughly three hours long. If Mr. Sylvester is picked up by 10:00 a.m., he should arrive at the courthouse by early afternoon to meet these requirements.

I have communicated with Pre-Trial Services Officer Shannon Finneran who has no objection to this request and they can meet with Mr. Sylvester after he signs the bond to arrange

for his supervision. I have communicated with the government through Ms. Ong, and she has no objection so long as he will be signing the bond and meeting with Pre-Trial Service the same day that he is released from the facility.

Therefore, I am requesting a modified release order directing BOP to release Mr. Sylvester at 10:00 a.m. on December 21, 2023, to the custody of his father to be transported to the White Plains federal courthouse to sign his bond and meet with Pre-Trial Service.

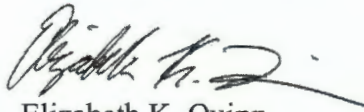
Thank you for your time and consideration.

Granted, on the conditions noted
herein.,

So Ordered.

12/20/23

Respectfully submitted,



Elizabeth K. Quinn
Kendra Hutchinson
Assistant Federal Defenders
Attorneys for Jakeem Sylvester

cc: Jennifer Ong, AUSA
Shannon Finneran, PTS